

## HOLBROOK & MURPHY

ATTORNEYS AT LAW  
PROCTORS IN ADMIRALTY

238-240 Lewis Wharf  
BOSTON, MASSACHUSETTS 02110

TELEPHONE (617) 428-1151  
FACSIMILE (617) 428-6919

E-MAIL: holbrook\_murphy@msn.com

May 24, 2007

### BY ELECTRONIC MAIL

Paul Cavanaugh  
Daly Cavanaugh LLP  
27 Mica Lane, Suite 101  
Wellesley, MA 02481-01741

Robert E. Collins  
Clinton & Muzyka, P.C.  
One Washington Mall, Suite 1400  
Boston, MA 02108

John Bruno  
Law Offices of Masi & Bruno  
124 Long Pond Road, Unit 11  
Plymouth, MA 02360

Robert Kiely  
Regan & Kiely, LLP  
85 Devonshire Street  
Boston, MA 02109

Deborah A. Crinigan  
White and Williams, LLP  
1800 One Liberty Place  
Philadelphia, PA 19103-7395

John Folan  
Folan & McGlone, PC  
401 County Box 2095  
New Bedford, MA 02741

**Re: *Standard Fire Ins. Co., et al. v. Crosby Yacht Yard, Inc., et al.***  
**Civil Action No.: 04-12244-GAO**

Dear Counsel:

We refer to the above and submit our disclosure of expert witnesses. We note that there has been a substantial amount of material received from counsel for the plaintiffs as well as Oyster Harbors, both as plaintiff and defendant. The following is only an initial designation and will be supplemented in the upcoming days as the material received from you is digested and analyzed.

The defendant Crosby designates the following:

1. William Nolan  
William Nolan Jr.  
Connell, Nolan Associates, Inc.  
724 Hamilton Avenue  
Westhampton Beach, NY 11978

Mr. Nolan and Mr. Nolan are fire cause and origin experts who will testify concerning the various aspects of the fire that involved the Crosby and Oyster Harbors' premises on December 10, 2003. They will also rebut the plaintiffs' experts' allegations concerning spray painting requirements as applied to the activity that went on at Crosby Yacht Yard. Their opinions will be based on their review of evidence at the scene, their investigation of the fire, as well as their experience and training as fire investigators, as well as their review of the depositions and other documentary evidence in this case.

2. Michael Collyer  
Marine Safety Consultants, Inc.  
Fairhaven, MA

Mr. Collyer is a marine surveyor who will testify concerning boatyard operations, as well as values of the various vessels that were damaged. His testimony will be based upon his attendance at the scene shortly after the fire, his review and inspection of the various vessels that were damaged in the fire, as well as his knowledge of the operations at Crosby Yacht Yard. He will also rebut the plaintiffs' experts' allegations concerning spray painting requirements as applied to the activity that went on at Crosby Yacht Yard. His opinions will be based on his education and training as a marine surveyor, as well as his review of the depositions and other documentary evidence in this case.

3. Jack Goodison  
J. Goodison Company, Inc.  
25 Curtis Street  
East Providence, RI 02914

Mr. Goodison is a principal of a spray paint company working in the marine field. He is knowledgeable concerning all aspects of spray painting of vessels and the regulations related thereto. He will testify concerning the spray painting that was going on at the Crosby Yacht Yard, as well as the regulations relating to spray painting. He will also rebut the plaintiffs' experts' allegations concerning spray painting requirements as applied to the activity that went on at Crosby Yacht Yard. His opinions will be based on his education and training in the marine industrial field with regards to spray painting and related areas, as well as his review of the depositions and other documentary evidence in this case.

4. Claudio Crivici  
Castlerock Risk Services, LLC  
85 Broadway  
Suite B  
Amityville, NY 11701

Mr. Crivici is a marine surveyor who will testify concerning boatyard operations, custom and practice in boatyards and marina and the applicability of the NFPA recommendations. His testimony will be based upon his attendance at the scene shortly after the fire, his review and inspection of the various vessels that were damaged in the

fire, as well as his knowledge of the operations at Crosby Yacht Yard. He will also rebut the plaintiffs' experts' allegations concerning spray painting requirements as applied to the activity that went on at Crosby Yacht Yard. His opinions will be based on his education and training as a marine surveyor, as well as his review of the depositions and other documentary evidence in this case.

The defendant expects to seasonably supplement this designation. Resumes and prior testimony details will be provided within the next few days.

Very truly yours,

/s/ Seth S. Holbrook

Seth S. Holbrook

SSH/jk